

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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|--|---|--------------------------|
| In re: | § | Chapter 11 |
| | § | |
| UNIVERSAL REHEARSAL PARTNERS, LTD., | § | Case No. 22-31966 |
| | § | |
| Debtor. | § | |

STIPULATION AND AGREED ORDER ABATING CLAIM OBJECTIONS

[Relates to Docket Nos. 135 and 136]

This stipulation (the "**Stipulation**") is made and agreed to between (i) Erik White, as trustee (the "**Trustee**") of the Universal Rehearsal Partners Liquidating Trust, successor in interest to the above-captioned debtor, (ii) Mr. Vince Barnhill ("**Barnhill**"), and (iii) Mr. John Kirtland ("**Kirtland**" and collectively with the Trustee and Barnhill, the "**Parties**") with respect to the Trustee's *Objection to Proof of Claim Filed by John Kirtland* [Dkt. #135] and *Objection to Proof of Claim Filed by Vince Barnhill* [Dkt. #136] (collectively, the "**Claim Objections**").

WHEREAS, the Trustee filed the Claim Objections on May 29, 2023, objecting to Proof of Claim No. 6 filed by Kirtland and Proof of Claim No. 8 filed by Barnhill (each a "**Claim**" and together the "**Claims**");

WHEREAS, the Claims of Kirtland and Barnhill cannot be determined without resolving the pending adversary proceedings related to this bankruptcy case, which are styled *Universal Rehearsal Partners LTD v. Barnhill* [Adv. Proc. No. 23-03011] and *John Kirtland v. Vince Edward Barnhill* [Adv. Pro. No. 23-03012] (collectively, the "**Adversary Proceedings**");

WHEREAS, for the foregoing reasons, and in the interests of judicial economy, the Parties desire to abate the Trustee's Claim Objections pending a resolution of the Adversary Proceedings.

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. The foregoing recitals are incorporated herein by reference as if set forth herein.
2. Subject to Court approval, the Claim Objections shall be abated pending resolution of the Adversary Proceedings as set forth in the proposed agreed order attached hereto.
3. This Stipulation is without prejudice to any motions, applications, or additional stipulations by the Parties with respect to the Claim Objections.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

Dallas, Texas
October 19, 2023

STIPULATED AND AGREED:

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